UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION

HON. ROBERT B. KUGLER Civil No. 19-2875 (RBK/JS)

NOTICE OF THE MOTION BY THE AUROBINDO AND TORRENT DEFENDANTS TO QUASH PLAINTIFFS' SUBPOENAS AND FOR A PROTECTIVE ORDER REGARDING SUBPOENAS ISSUED TO ALCAME CORPORATION, AXIS CLINICALS, CATALENT, GIBRALTER LABORATORIES, INC., MEDICAL AFFAIRS COMPANY, MERIDIAN CONSULTING, NOVARTIS PHARMACEUTICAL, PERITT LABORATORIES, RISING PHARMACEUTICALS, SDS ENVIRONMENTAL SERVICES, TOXROX CONSULTING, LLC

To: Marlene J. Goldenberg, Esquire Goldenberg Law, PLLC 800 LaSalle Avenue, Suite 2150 Minneapolis, MN 55401

PLEASE TAKE NOTICE that on a date to be decided after October 29, 2020, the Aurobindo defendants and Torrent defendants, by and through their undersigned counsel, shall move before the Honorable Robert B. Kugler and the Honorable Joel Schneider for an ORDER quashing the subpoenas served upon:

- 1. Alcame Corporation
- 2. AXIS Clinicals
- 3. Catalent
- 4. Gibralter Laboratories, Inc.
- 5. Medical Affairs Company
- 6. Meridian Consulting
- 7. Novartis Pharmaceutical
- 8. Peritt Laboratories
- 9. Rising Pharmaceuticals
- 10. SDS Environmental Services
- 11. Sipra Labs Limited
- 12. ToxRox Consulting, LLC

Dated: October 29, 2020

Respectfully submitted,

s/ Jessica M. Heinz

Ernest F. Koschineg, III
Jessica M. Heinz
CIPRIANI & WERNER, P.C.
450 Sentry Parkway East, Suite 200
Blue Bell, PA 19422
610-567-0700 Telephone
610-862-1929 Facsimile
ekoschineg@c-wlaw.com
jheinz@c-wlaw.com

Attorneys for Aurobindo Pharma, Ltd., Aurobindo Pharma USA, Inc. and Aurolife Pharma LLC

/s/ Alexia R. Brancato

Devora W. Allon Alexia R. Brancato KIRKLAND & ELLIS LLP 601 Lexington Avenue New York, NY 10022

T: (212) 446-4800 F: (212) 446-4900

Counsel for Torrent Pharmaceuticals, Ltd. and Torrent Pharma, Inc.